

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

BRUSSELS • FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

November 2, 2020

Via ECF

The Honorable George B. Daniels,
United States District Judge,
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street,
New York, New York 10007-1312.

Re: *In re ICE LIBOR Antitrust Litigation*, 19-cv-00439 (GBD)

Dear Judge Daniels:

Sullivan & Cromwell LLP is counsel to Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Crédit Agricole S.A., Crédit Agricole Corporate and Investment Bank, Credit Agricole Securities (USA) Inc., MUFG Bank, Ltd., MUFG Securities Americas Inc., and Mitsubishi UFJ Financial Group, Inc. in the above-captioned action.

Jacey Lara Gottlieb, one of your former law clerks, is joining Sullivan & Cromwell LLP today as an associate in the firm's New York office. We are writing to Your Honor pursuant to New York Rule of Professional Conduct 1.12, which (i) bars a former law clerk from representing a client in connection with a matter in which he or she participated personally and substantially while clerking, and (ii) describes notification and screening requirements that must be put in place to ensure that the former law clerk does not share information regarding the matter with others at the firm. This letter sets out Sullivan & Cromwell LLP's compliance with the requirements of Rule 1.12.

1. Sullivan & Cromwell LLP has taken the following steps to screen Ms. Gottlieb from this matter:

- a. I have notified Ms. Gottlieb in writing that she is not to participate in this matter, discuss it with lawyers or nonlawyer personnel working on it, or review any documents relating to it.
- b. I have notified in writing all lawyers, legal analysts, legal assistants and lawyers' secretaries that they are not to discuss this matter with Ms. Gottlieb or allow her access to documents concerning it.

The Honorable George B. Daniels

-2-

- c. I have sent a memorandum to the firm's Records Department instructing it not to allow Ms. Gottlieb to have access to any files relating to this matter. This triggers restrictions on Ms. Gottlieb's access to electronic documents relating to the matter.

2. As Ms. Gottlieb is a salaried employee, she will not share in any fees attributable to Sullivan & Cromwell LLP's work on this matter.

If the Court requires any additional information concerning these measures, please let us know, and we will be happy to provide it.

Respectfully submitted,

/s/ Joseph E. Neuhaus

Joseph E. Neuhaus
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Fax: (212) 558-3588
neuhausj@sullcrom.com

cc: *All Counsel of Record* (via ECF)